

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: September 12, 2024 at 1:00 P.M. ET

Objection Deadline: August 12, 2024 at 4:00 P.M. ET

Ref. Nos. 19176 & 19185

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIFTY-SIXTH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On July 1, 2024, the Debtors filed the *Debtors' Fifty-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 19176, sealed & 19185, redacted] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 19176-1 & 19185-1], any responses to the Objection were to be filed no later than August 12, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 68465, 89476, 1998, 80491, 80785, 81211, 81880,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

41142, 60437, and 49593.

4. On August 12, 2024, Bequant Prime Limited filed a letter in response to the Objection [D.I. 22779] (the “Bequant Response”).

5. On August 12, 2024, DCP Master Investments XIV LLC as Transferee of Name on File (“DCP”) filed letters in response to the Objection [D.I. 22780 & D.I. 22781] (the “DCP Responses”)

6. On October 22, 2024, Green Healthy House filed a letter in response to the Objection [D.I. 27187] (the “Green Healthy House Response”).

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

8. The Debtors resolved the Informal Response from the holder of claim number 60437 without modification to the schedule attached to the proposed form of order.

9. The Debtors are withdrawing the Objection solely with regard to DCP’s claim and to claim numbers 1998 and 78947 without prejudice and with all rights of the parties reserved with regard thereto.

10. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawals and adjournments to the Objection solely with regard to the Bequant Response, the Green Healthy House Response and claim numbers 68465, 89476, 80491, 80785, 81211, 81880, 41142 and 49593. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”). The Committee has no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean

copy of the Revised Order shall be uploaded to CM/ECF.

11. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 19, 2024
Wilmington, Delaware

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